

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS RAY JONES,

Defendant.

Case: 4:21-cr-20338
Judge: Leitman, Matthew F.
MJ: Ivy, Curtis
Filed: 05-19-2021
SEALED MATTER (tt)

FILED
MAY 19 2021

U.S. DISTRICT COURT
FLINT, MICHIGAN

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Felon in possession of a firearm
(18 U.S.C. § 922(g)(1))**

On or about May 5, 2021, in the Eastern District of Michigan, Nicholas Jones, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Smith & Wesson, model M&P 15-22, .22 caliber rifle, a Glock, model 30, .45 caliber semi-automatic handgun, a Glock, model 30S, .45 caliber semi-automatic handgun, a Sig Sauer, model P320 M18, 9mm semi-

automatic handgun, and a Sig Sauer, model P365, 9mm semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

**Possession of a firearm made in violation of the National Firearms Act
(26 U.S.C. § 5861(c))**

On or about May 5, 2021, in the Eastern District of Michigan, Nicholas Jones, knowingly received and possessed a firearm, that is, a Smith & Wesson, model M&P 15-22, .22 caliber rifle, made in violation of chapter 53 of Title 26, by having sawed off the shoulder stock and creating a weapon made from a rifle with an overall length of less than 26 inches, in violation of Title 26, United States Code, Sections 5822, 5845(a)(4), 5861(c), and 5871.

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all property involved in, or property traceable to, the violations alleged in this Indictment.

THIS IS A TRUE BILL.

Dated: May 19, 2021

s/GRAND JURY FOREPERSON

SAIMA MOHSIN
Acting United States Attorney

s/TIMOTHY M. TURKELSON
TIMOTHY M. TURKELSON (P53748)
Assistant United States Attorney
101 First Street, Suite 200
Bay City, MI 48708
Telephone number: (989) 895-5712
Timothy.turkelson@usdoj.gov

ANTHONY P. VANCE
ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed by AUSA and initialed.United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet**Case: 4:21-cr-20338
Judge: Leitman, Matthew F.
MJ: Ivy, Curtis
Filed: 05-19-2021
SEALED MATTER (tt)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TT

Case Title: USA v. NICHOLAS RAY JONESCounty where offense occurred : GENESEECheck One: ☒ **Felony**☐ **Misdemeanor**U.S. DISTRICT COURT
FLINT, MICHIGAN

☒ Indictment/___ Information --- **no** prior complaint.

___ Indictment/___ Information --- based upon prior complaint [Case number: _____]

___ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 19, 2021

Date

s/TIMOTHY TURKELSON

Timothy Turkelson
Assistant United States Attorney
210 Federal Building
600 Church Street
Flint, Michigan 48502
Telephone: (810) 766-5177
Email: Timothy.Turkelson@usdoj.gov
P53748

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.